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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

EDWARD FISH,

Debtor.

Case No. 20-18905-JKS

Chapter 13

Judge: Hon. John K. Sherwood

Hearing Date: March 23, 2023

OPPOSITION TO MOTION TO DISMISS FILED BY RENATA FISH

I, Edward Fish, being of full age do hereby certify as follows:

1. I am the debtor in the above captioned case, and as such am familiar with the facts recited herein.
2. I am filing this Certification in Opposition to the Motion to Dismiss (the “Motion”) filed by Renata Fish (“Renata”).
3. On July 26, 2020 (the “Petition Date”), I commenced this case by filing a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
4. In my schedules filed August 27, 2020, I listed Renata Fish as a nonpriority creditor with a claim of \$60,000.00 for the purposes of equitable distribution. See Doc. No. 15.
5. On December 16, 2019, Renata and I entered into a Matrimonial Settlement Agreement (the “Settlement Agreement”). See **Exhibit A** attached hereto.

6. On July 27, 2020, the State Court deciding the divorce filed in the civil action an order determining that I shall pay an extra \$200.00 per month to begin repaying the amount in arrears at that time. See Exhibit B attached hereto.
7. On January 26, 2021, Debtor's Amended Schedules included the address and notice to Renata in addition to the updated claim for domestic support obligation. See Doc. No. 44.
8. On October 18, 2021, Debtor's Modified Plan was confirmed. See Doc. No. 85.
9. On August 18, 2022, Renata filed an adversary complaint, wherein she sought non-dischargeability of an alleged domestic support obligation arising from equitable distribution of real property. See Doc. No. 96.
10. On February 22, 2023, Renata filed the current Motion.
11. In it, she claims that I was not current on all post-filing support obligations at the time of the pre-confirmation certification and have failed to pay any support payments as of January 2023.
12. I intend to have all post-petition arrears paid in full prior to the return date of this Motion.

Dated: March 16, 2023

/s/*Edward Fish*
Edward Fish